

**REMARKS**

Applicant hereby traverses the outstanding rejections, and requests reconsideration and withdrawal in light of the remarks contained herein. Claim 18 has been amended. Claims 1-21 are pending in this application.

**Rejection under 35 U.S.C. § 103**

Claims 1-21 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Knutson et al. ('746, hereinafter Knutson) in view of Bleizeffer et al. ('371, hereinafter Bleizeffer).

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. § 2143. Without conceding the second criteria, Applicant asserts that the rejection does not satisfy the first and third criteria.

**Lack of Motivation**

It is well established that when a proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. M.P.E.P. § 2143.01, citing *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).

The Examiner stated that it would have been obvious to combine the teachings of Knutson with the teachings of Bleizeffer so as to obtain a graph generator generating the desired graphic format report via GUI. The motivation being to allow the user to make decisions based on generating a report. Applicant respectfully asserts that the teaching of Bleizeffer and the teaching of Knutson are not combinable without rendering Knutson unsatisfactory for its intended purpose.

As stated Knutson describes a system for generating reports on data retrieved from a data warehouse. See, Abstract. Bleizeffer, on the other hand, is a system to filter a set of SQL query statements to show the resources required by the query statements. See, Abstract,

and column 4, lines 47-66. As a result, the report creator and graph generator create a specific report showing resource requirements and a graphical representation of the access path of the SQL statements to show the relationship between database objects and operations. Figure 5, and column 7, lines 6-19. The report creator and graph generator described in Bleizeffer are only used to create very specialized and very specific reports based SQL statement filtering. As the report generator of Knutson generates general purpose business reports from data residing in a data warehouse, and the specialized report creator and graph generator of Bleizeffer are only used to show very specific resource usage of a database systems for SQL statements, the system of Knutson could not be modified with the report creator and graph generator of Bleizeffer without rendering Knutson unsatisfactory for its intended purpose, as Knutson would be unable to fulfill its intended purpose of general business reports using the specialized elements found in Bleizeffer. The combination put forth by the Examiner, therefore, does not comport with the requirements of M.P.E.P. § 2143.01 and is, therefore, improper. Therefore, the rejection of claims 1-21 should be withdrawn.

#### Lack of All Limitations

Claim 1 requires a first generator, operably linked through a first interface to one or more associated first type components...and a second generator, operably linked through a second interface to one or more associated second type components. Knutson describes a system and method for allowing a user to segment and partition a database based upon attributes associated with the data in the database. See, Abstract The system includes a data abstraction intelligence (DAI) subsystem 14, which further includes a report generator 72 capable of generating reports from retrieved data. See Figure 3, Abstract, and column 15, line 63 through column 16 line 54. Figures 6-12, cited by the Examiner, show a GUI user interface through which the parameters associated with a report may be entered. Knutson does not describe, and Bleizeffer is not relied upon to show, a first generator operably linked through a first interface to one or more first type components. Knutson does not show smart report generator 72 connected to any components, only mechanisms to retrieve data and set parameters. See, Figure 3.

The Examiner admits that Knutson does not explicitly teach a second generator, operably linked through a second interface to one or more associated second type

components, which invokes at least one second type component to generate a report element of a second type. The Examiner attempts to cure this deficiency by introducing Bleizeffer, which the Examiner alleges to teach having such an element.

Bleizeffer describes an apparatus for filtering database queries, specifically queries written in SQL. See Abstract, and column 2, lines 62 through column 3, line 4. Bleizeffer includes a query visualization module 50 which operates both to provide a report on query access path data, statement cost data, and object statistics, and to provide a graphical representation of the access path of a query statement. Column 6, lines 45-64, and Figure 5 While Bleizeffer is asserted by the Examiner to show a second generator, using report creator 60 and graph generator 62, Bleizeffer also does not show either one or more associated first type components, nor one or more associated second type components. Neither element, report creator 60 or graph generator 62, is connected to any associated component, as is explicitly shown in Figure 3. Each element is connected to user interfaces, as with Knutson, but neither shows any associated components.

As neither Knutson, nor Bleizeffer show one or more associated first components, or one or more associated second components, neither reference shows a first interface or second interface in accordance with claim 1. As stated, each show a single user interface but not a first generator operably connected through a first interface, and a second generator operably connected through a second interface. Thus, the combination of references do not teach all of the claimed limitations. Therefore, the Applicant respectfully asserts that for the above reasons claim 1 is patentable over the 35 U.S.C. § 103(a) rejection of record.

Claims 2-11 depend from claim 1, and are allowable as being dependent from an allowable base claim for the reasons set forth above with respect to claim 1. Specifically, claims 2-11 each require, through their dependencies from claim 1, one or more associated first components, one or more associated second components, a first interface and second interface. For the reasons set forth with respect to claim 1, neither Knutson, nor Bleizeffer describe these limitations. Applicant, therefore, respectfully asserts that claims 2-11 are allowable, for at least the reasons set forth, over the 35. U.S.C. §103 rejection.

Claim 12 requires a first generator, operably linked through a first interface to one or more associated first type components...and a second generator, operably linked through a

second interface to one or more associated second type components. As stated above Knutson includes a smart report generator and a user interface. Knutson does not describe, and Bleizeffer is not relied upon to show, a first generator operably linked through a first interface to one or more first type components. Knutson does not show the smart report generator connected to any components, only mechanisms to retrieve data and set parameters. Further, as acknowledged by the Examiner, Knutson does not show a second generator.

While Bleizeffer is asserted by the Examiner to show a second generator, Bleizeffer also does not show either one or more associated first type components, nor one or more associated second type components. Neither element, report creator 60 or graph generator 62, is connected to any associated component, as is described above. Each element is connected to user interfaces, as with Knutson, but neither shows any associated components.

As neither Knutson, nor Bleizeffer show one or more associated first components, or one or more associated second components, neither reference shows a first interface or second interface in accordance with claim 12. As stated, each show a single user interface but not a first generator operably connected through a first interface, and a second generator operably connected through a second interface. Thus, the combination of references do not teach all of the claimed limitations. Therefore, the Applicant respectfully asserts that for the above reasons claim 12 is patentable over the 35 U.S.C. § 103(a) rejection of record.

Claims 13-17 depend from claim 12, and are allowable as being dependent from an allowable base claim for the reasons set forth above with respect to claim 12. Specifically, claims 13-17 each require, through their dependencies from claim 12, one or more associated first components, one or more associated second components, a first interface and second interface. For the reasons set forth with respect to claim 12, neither Knutson, nor Bleizeffer describe these limitations. Applicant, therefore, respectfully asserts that claims 13-17 are allowable, for at least the reasons set forth, over the 35. U.S.C. §103 rejection.

### **Conclusion**


In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge Deposit Account No. 08-2025, under Order No. 10005480-1 from which the undersigned is authorized to draw.

I hereby certify that this correspondence is being deposited with the United States Postal Service as Express Mail, Label No. EV482745809US in an envelope addressed to: MS AF, Commissioner for Patents, Alexandria, VA 22313.

Date of Deposit: February 22, 2005

Typed Name: June Nguyen

Signature: 

Respectfully submitted,

By: 

Michael A. Papalas  
Attorney/Agent for Applicant(s)  
Reg. No. 40,381  
Date: February 22, 2005  
Telephone No. (214) 855-8186